

## RE: MNG640000 - Water Treatment Plant General Permit - Revised Fact Sheet

Blasing, Nicole (MPCA) <nicole.blasing@state.mn.us>

Tue 10/10/2017 11:28 AM

To: Ireland, Scott <ireland.scott@epa.gov>; Bauer, Candice <bauer.candice@epa.gov>; Azevedo, George <azevedo.george@epa.gov>; Hewitt, Jason <Hewitt.Jason@epa.gov>;

Cc: Heskett, Nancy (MPCA) <nancy.heskett@state.mn.us>; Novotny, Robin (MPCA) <robin.novotny@state.mn.us>; Weiss, Steven (MPCA) <steven.weiss@state.mn.us>; Anderson, Michael J. (MPCA) <michael.j.anderson@state.mn.us>;

1 attachments (13 KB)

MNG64 Permittee List.docx;

Thank you for your review of the updated factsheet and the additional questions. I have included answers to your questions below.

1. Can MPCA include in the GP the number of Facilities that will be covered?

Although the MPCA already has a number of applications/notice of intents (NOI) to be covered under the general permit that have been submitted the MPCA cannot anticipate how many applications/NOIs may come in through the term of the permit. Therefore the MPCA cannot include the number of WTPs that will be covered under the general permit within the general permit.

2. Can MPCA include in the GP a list of the names of these Facilities?

The MPCA can provide you with a list of WTP permittees that have already submitted applications/NOIs to be covered under the general permit but since the MPCA cannot anticipate how many applications/NOIs may come in through the term of the permit a list of permittees cannot be included within the general permit.

3. Is there a general expectation for the size of a Facility that will apply? For example, if a large Facility (e.g. St. Paul) applies for the permit, and the discharge is greater than 1 MGD, does MPCA plan to issue an individual permit?

As outlined in the facility description and the general permit applicability criteria, the general permit only provides NPDES permit coverage to WTPs that utilize media filters to remove suspended solids from source water. The filters are backwashed to remove the suspended solids. The backwashed water is then put into a holding tank where the solids are settled out over a 24 hour period prior to the water being discharged to a surface water.

A significant amount of water is not used in the backwash process. The current permitted flows for the WTPs covered under the general permit range from 0.003 – 0.4 million gallons per day (MGD). MPCA doesn't expect that a WTP that strictly operates a media filter would generate enough backwash water to discharge at or greater than 1 MGD. Larger WTPs usually have additional complexities or a variety of treatment capabilities that

require them to be covered under an individual permit. Currently the WTPs that service both St. Paul and Minneapolis are covered under individual permits, due to the complexity of their treatment processes.

The following general permit applicability criteria addresses this situation:

General Permit Reqs. 5.3.6, d & h

- d. The facility utilizes media filters as its treatment type as outlined in the facility description of this general permit.
- h. The discharge will meet the limits assigned to the facility in the NOC and the limits and monitoring section of the general permit at the time of NOC issuance.

Additionally, any new discharge is required to be initially covered under an individual permit in accordance with the following general permit applicability criteria:

General Permit Reqs. 5.3.6, a

- a. New discharges to surface water shall be covered under an individual permit until completion of construction of the facility prior to qualification under the general permit.

4. In addition, what if a Facility increases its flow (e.g. via an expansion above 1 MGD), does MPCA plan to issue an individual permit?

Yes, Per the following general permit applicability criteria:

General Permit Reqs. 5.3.6, a & b

- a. New discharges to surface water shall be covered under an individual permit until completion of construction of the facility prior to qualification under the general permit.
- b. The facility is not proposing a significant upgrade.

Please let me know if you have any additional questions.

Thank you,

Nicole Blasing, Supervisor  
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Municipal Wastewater Section  
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**From:** Ireland, Scott [mailto:ireland.scott@epa.gov]

**Sent:** Wednesday, October 04, 2017 1:18 PM

**To:** Blasing, Nicole (MPCA) <nicole.blasing@state.mn.us>; Bauer, Candice <bauer.candice@epa.gov>; Azevedo, George <azevedo.george@epa.gov>; Hewitt, Jason <Hewitt.Jason@epa.gov>

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Nicole,

Thanks for the response on this GP. We believe the issue between whether a facility is category 1 vs 2 has been adequately outlined. We did bring up a couple other items on the September 8<sup>th</sup> call.

A couple were things we thought would be helpful if they could be added to the permit:

5. Can MPCA include in the GP the number of Facilities that will be covered?
6. Can MPCA include in the GP a list of the names of these Facilities?

The last two were more process questions.

1. Is there a general expectation for the size of a Facility that will apply? For example, if a large Facility (e.g. St. Paul) applies for the permit, and the discharge is greater than 1 MGD, does MPCA plan to issue an individual permit?
2. In addition, what if a Facility increases its flow (e.g. via an expansion above 1 MGD), does MPCA plan to issue an individual permit?

Thanks,  
Scott

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**From:** Blasing, Nicole (MPCA) [<mailto:nicole.blasing@state.mn.us>]  
**Sent:** Thursday, September 28, 2017 9:38 AM  
**To:** Bauer, Candice <[bauer.candice@epa.gov](mailto:bauer.candice@epa.gov)>; Ireland, Scott <[ireland.scott@epa.gov](mailto:ireland.scott@epa.gov)>; Azevedo, George <[azevedo.george@epa.gov](mailto:azevedo.george@epa.gov)>; Hewitt, Jason <[Hewitt.Jason@epa.gov](mailto:Hewitt.Jason@epa.gov)>  
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**Subject:** MNG640000 - Water Treatment Plant General Permit - Revised Fact Sheet

I have attached the updated fact sheet for the MNG640000 General Permit that we currently have with you for review. Revisions have been made to the fact sheet to address the comments/questions raised at our meeting on September 8, 2017.

Please let me know if you have any additional questions or would like to set up a meeting to discuss the material.

Thank you,

Nicole Blasing, Supervisor  
North Central Regional Unit  
Municipal Wastewater Section  
Ph. 218-316-3890

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